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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 UNITED STATES OF AMERICA,)	No. CR-10-0550 & 14-0154 RS
)	
13 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE
14 v.)	
)	
15 LEEVERETT HALL,)	
)	
16 Defendant.)	
_____)	

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1 The parties jointly request that, subject to the Court's approval, the status conference
2 presently set for June 17, 2014 be continued to July 1 at 2:30 pm.

3 At the last appearance, the Court set both of the above-captioned matters over until June
4 17, 2014 for further status. Unfortunately, defense counsel is also scheduled to appear before the
5 Honorable Jeffrey S. White that afternoon in Oakland, and therefore is unavailable.
6 Additionally, the parties are currently in negotiations over this case and government counsel
7 recently provided the defense with new information relevant to those negotiations. Accordingly,
8 the parties jointly request additional time for continuity of counsel, to investigate this case and to
9 effectively prepare.

10 For the above reasons, the parties stipulate there is good cause – taking into account the
11 public interest in the prompt disposition of this case – to exclude the time from June 17, 2014 to
12 July 1, 2014 from computation under the Speedy Trial Act, and that failing to exclude that time
13 would unreasonably deny the defendant and his counsel the reasonable time necessary for
14 continuity of counsel, taking into account the exercise of due diligence. 18 U.S.C. §
15 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by
16 excluding the time from June 17, 2014 to July 1, 2014 from computation under the Speedy Trial
17 Act and that the need for the exclusion outweighs the best interests of the public and the
18 defendant in a speedy trial.

19 IT IS SO STIPULATED.

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21 6/11/2014
22 DATED

/s/
BENJAMIN P. TOLKOFF
Assistant United States Attorney

23
24 6/11/2014
DATED

/s/
JODI LINKER
Assistant Federal Public Defender

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26 IT IS SO ORDERED.

27 6/11/14
28 DATED


RICHARD SEEBORG
United States District Judge